

REMARKS

Reconsideration and allowance are respectfully requested. Claim 14 has been amended. Claims 2-12 and 14-20 remain pending.

The allowance of claims 2-12 and 17-20 is noted with thanks.

Claim 14 stands rejected under 35 U.S.C. 112, second paragraph. The claim has been amended and is considered to be in full compliance with 35 U.S.C. 112. Therefore, the rejection should be withdrawn.

Claims 14 and 16 stand rejected under 35 U.S.C. 102(b) as being anticipated by Lange. Claim 14 has been amended to define the invention more clearly and thus, obviate the rejection. In particular, claim 14 as amended recites that the side portions protrude inwardly into the side aperture and are coplanar with the planar portion. The aperture is constructed and arranged to receive a bolt. The side portions 30 having bolt-receiving apertures 32 is shown clearly in Fig. 3 of the specification.

The side portions 24/25 of Lange are on a plane different from a plane of portion 18. Furthermore, the notches 26 of Lange receive a detent 44 and are not constructed and arranged to receive a bolt. Furthermore, the side apertures of Lange are not oval as claimed.

Hence, the rejection should be withdrawn because Lange does not disclose each and every element of the claim. See MPEP 2131. "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). "Anticipation cannot be predicated on teachings in the reference which are vague or based on conjecture." *Studiengesellschaft Kohle mbH v. Dart Industries, Inc.*, 549 F. Supp. 716, 216 USPQ 381 (D. Del. 1982), *aff'd.*, 726 F.2d 724, 220 USPQ 841 (Fed. Cir. 1984).

Claim 15 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Lange. Claim 15 depends from claim 14 and is considered to be allowable for the reasons advanced above with regard to claim 14 and, for the additional reason, that the added subject matter thereof is not taught or suggested by Lange.

All rejections having been addressed, it is respectfully submitted that this application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'E. Stemberger', with a long horizontal flourish extending to the right.

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